

DRAFT/PROPOSED CAAPP PERMIT
November 12, 2014

Attention:

Accurate Dispersions
Attn: Ronald Reinstein, Compliance Director
192 West 155th Street
South Holland, Illinois 60473

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Source:

Accurate Dispersions
192 West 155th Street
South Holland, Illinois 60473

I.D. No.: 031297ACG
Permit No.: 98030121

Permitting Authority:

*Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705*

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Type of Application: Renewal

ID No.: 031297ACG

Permit No.: 98030121

Statement of Basis No.: 98030121-201411

Date Application Received: February 28, 2011

Date Issued: TBD

Expiration Date: TBD

Renewal Submittal Date: 9 Months Prior to TBD

Source Name: Accurate Dispersions

Address: 192 West 155th Street

City: South Holland

County: Cook

ZIP Code: 60473

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact LeeAnne Kinsella at 217/782-3006.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:LAK:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database 3

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Section 1 - Source Information

1. Addresses

Source

Accurate Dispersions
192 West 155th Street
South Holland, Illinois 60473

Owner

The Sherwin Williams Company
101 Prospect Avenue, NW
Cleveland, Ohio 44115

Operator

Accurate Dispersions
192 West 155th Street
South Holland, Illinois 60473

Permittee

The Owner and Operator of the source as
identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	David Falk	Vice President of Operations
<i>Delegated Authority</i>	No other individuals have been authorized by the Illinois EPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Ronald Reinstein Compliance Director	(708) 333-1337	rreinste@accurate-dispersions.com
<i>Technical Contact</i>	Ronald Reinstein	(708) 333-1337	rreinste@accurate-dispersions.com
<i>Correspondence</i>	Ronald Reinstein	(708) 333-1337	rreinste@accurate-dispersions.com
<i>Billing</i>	Ronald Reinstein	(708) 333-1337	rreinste@accurate-dispersions.com

3. Source Description

The source (SIC Code 2851) manufactures colored dispersions (colorants) which are used by other manufacturers to tint or color paints or other products. The dispersions/colorants are typically heavily pigmented, high percent solids, viscous liquids that can be solvent based or water based. **Note:** This narrative description is included for informational purposes only.

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s): None

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the Illinois EPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the Illinois EPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Permittee may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the Illinois EPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.

- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The Illinois EPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow Illinois EPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the Illinois EPA, or an authorized representative to perform the following:

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- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the

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applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator: The Illinois EPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative and corrective maintenance activities.

b. Retention of Records

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the Illinois EPA for copies of records or reports required to be kept by this permit, the Permittee

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shall promptly submit a copy of such material to the Illinois EPA. For this purpose, material shall be submitted to the Illinois EPA within 30 days unless additional time is provided by the Illinois EPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(A) and (C) of the Act, the source shall submit annual compliance certifications by May 1 or more frequently as specified in an applicable requirement. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status, i.e., compliant, non-compliant, or intermittent.
 - C. The method(s) used for determining the compliance status of the source.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after **Error! Bookmark not defined.** (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the Illinois EPA does not and shall not be construed as barring, diminishing, adjudicating or in any

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way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Illinois EPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the Illinois EPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

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9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The Illinois EPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The Illinois EPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Section 39.5(5)(e) and (i) of the Act, the Illinois EPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the Illinois EPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Section 39.5(5)(l) and (o) of the Act]

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- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Wide Requirements

1. Applicable Requirements

Pursuant to Section 39.5(7)(a), (b), and (d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)
 - A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall conduct semi-annual observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, observations shall be conducted at a downwind location along the property line. Each observation shall last at least one minute. The observations may be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, wind speed and duration of any fugitive emissions event(s).
 - B. Pursuant to 35 IAC 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 IAC 212.304 and all normal traffic pattern roads and parking facilities which are located on manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 IAC 212.309, 212.310 and 212.312.
 - C. Pursuant to 35 IAC 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
 - D. Pursuant to 35 IAC 212.314, determination of wind speed for the purposes of 35 IAC 212.314 shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on-site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
 - E. Pursuant to Section 39.5(7)(b) and (d) of the Act, upon request by the Illinois EPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations, each with an observation period of at least one minute, shall be conducted for a week for particular area(s) of concern at the source, except that a longer observation period may be specified in the request. Observations shall begin either within one day or three days of receipt of a

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written request from the Illinois EPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. To the extent possible, all observations shall be made during periods of peak production activity. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, wind speed and duration of any fugitive emissions event(s).

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Permittee must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(c)(ii), below, and 40 CFR 61.145(b), the Permittee shall pay to the Illinois EPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61, Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill the notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

d. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR Parts 60, 61, 62, or 63; or 35 IAC Subtitle B after the date of issuance of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

e. Emissions Calculation Methodology

- i. Pursuant to Section 39.5(7)(b) and (d) of the Act, if an applicable requirement contained in this permit does not require the use of a specific methodology for calculating emissions or a specific calculation methodology is not specified, the Permittee shall comply with the following hierarchy (in order of preference) to determine the appropriate methodology for calculating emissions:
 - A. Continuous Emissions Monitoring (CEM) data (both compliance and/or indicator monitors);
 - B. Site specific emission factor based on performance testing that directly measures the emissions in conjunction with material balance calculations and process data;
 - C. Emissions information from equipment vendor(s) and manufacturer's emission performance guarantee(s);
 - D. Actual emissions data from similar equipment where the Illinois EPA has approved the use of such data (in order of preference):
 - I. CEM data (both compliance and/or indicator monitors);
 - II. Performance test data that directly measures the emissions;
 - III. Emission modelling information.
 - E. Industry-derived emission factors, including the appropriate emissions calculation equations contained in STAPPA/ALAPCO/USEPA Emission Inventory Improvement Program's (EIIP) surface evaporation model for calculating emissions from surface evaporation of VOM from open or partially covered mixing tanks during coating mixing operations, Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8 (February 2005 or later version);
 - F. Emission factors published in the latest version of EPA's Compilation of Air Pollutant Emission Factors (AP-42), with "A"-rated AP-42 emission factors being considered first and the lower rated emission factors in ascending alphabetical order second (B through E);
 - G. Engineering estimation and/or judgment.
- ii. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a record of documentation that demonstrates the Permittee's review of the hierarchy in condition 3.1(e)(i), above, before selecting the emissions calculation methodology including at a minimum, supporting information that justifies the appropriateness of the specific emission factor used, how the emission factor is representative of the specific equipment and/or operating conditions, the emission factors limitations and risk of adverse impacts due to the accuracy of the calculation.

2. Applicable Plans

Pursuant to Section 39.5(7)(a), (b), and (d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309(a), any storage piles, conveyor loading operations, traffic areas, roadways, parking areas, materials collected by pollution control

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- equipment, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations located at the source, as described in 35 IAC 212.304 through 212.308 and 35 IAC 212.316, shall be operated under the provisions of a Fugitive PM Operating Program, consistent with 35 IAC 212.310 and 212.312, prepared by the Permittee and submitted to the Illinois EPA for its review and approval. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions.
- ii. Pursuant to 35 IAC 212.310, as a minimum the Fugitive PM Operating Program shall include the following:
 - A. The name and address of the source;
 - B. The name and address of the owner or operator responsible for execution of the operating program;
 - C. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - D. Location of unloading and transporting operations with pollution control equipment;
 - E. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212, Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - F. Estimated frequency of application of dust suppressants by location of materials; and
 - G. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
 - iii. Pursuant to Section 39.5(7)(a) of the Act, the Fugitive PM Operating Program, as submitted by the Permittee on October 20, 2014, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways and other subject operations located at the facility that are subject to 35 IAC 212.309.
 - iv. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that it is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the Illinois EPA for review and approval within 30 days of such amendment.
 - v. Pursuant to Section 39.5(7)(a) of the Act, any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the Illinois EPA within 30 days of receipt of the revision. In the event that the Illinois EPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
 - vi. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep on-site a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and a record of activities

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completed according to the Fugitive PM Operating Program. Off-site records may be maintained if they are retrievable within 4 hours.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit the following items:

- i. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- ii. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 2.6.

d. Episode Action Plan (EAP)

- i. Pursuant to 35 IAC 244.141 and 244.142, the Permittee shall have on file with the Illinois EPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to Section 39.5(7)(a) of the Act, the Episode Action Plan, as submitted by the Permittee on September 25, 2014, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- iv. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the Illinois EPA for review and approval within 30 days of the change.
- v. Pursuant to Section 39.5(7)(a) of the Act, any future revision to the Episode Action Plan is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the Illinois EPA within 30 days of receipt of the revision. In the event that the Illinois EPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- vi. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep on-site a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(d)), and a record of activities completed according

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to the Episode Action Plan. Off-site records may be maintained if they are retrievable within 4 hours.

3. Synthetic Minor Limits

a. Emissions of Hazardous Air Pollutants (HAPs)

- i. Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall not exceed the following limits: [T1N]

A. 0.8 tons/month and 8 tons/year of any individual HAP;

B. 2.0 tons/month and 20 tons/year of all HAPs combined.

The Permittee has requested this limitation to ensure that it remains an area source of HAP emissions pursuant to Section 112 of the Clean Air Act.

ii. Compliance Method (HAPs)

- A. Pursuant to Section 39.5(7)(a), (b) and (d), compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Section 39.5(7)(a), (b) and (d), the Permittee shall comply with the production, operational and work practice standards and associated monitoring and recordkeeping requirements for VOM emissions as addressed by the unit-specific requirements in Sections 4, 5 and 6 of this permit.
- C. Pursuant to Section 39.5(7)(a), (b) and (d), for each calculation of VOM emissions from a process or raw material, as required in Sections 4, 5 and 6 of this permit, the Permittee shall also calculate HAP emissions from that process or raw material following the methodology used to calculate VOM emissions except that the Permittee shall use the HAP content of the raw material in its calculation of individual HAP emissions.

Recordkeeping

- A. Pursuant to Section 39.5(7)(e) of the Act, the Permittee shall maintain the following records according to Condition 2.5:
- I. Monthly and annual individual and combination HAP emissions from each emission unit listed in Sections 4, 5 and 6, calculated according to the emissions estimation hierarchy in Condition 3.1(e).
- II. For each formulation of raw material processed in the equipment listed in Sections 4, 5 and 6, the Permittee shall maintain the following information:
1. Name;
 2. Composition (i.e. weight of different raw materials);
 3. Maximum vapor pressure of the solvents and other VOM and HAP containing raw materials;
 4. HAP content of the solvents and other HAP containing raw materials;
 5. Batch size(s);

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6. Maximum volumetric displacement rate for closed and partially-closed vessels;
 7. Maximum temperatures at which materials are added and mixed.
- III. All VOM and HAP composition data must represent the most current data for the associated raw material as provided in the material safety data sheets (MSDSs) or other specification data sheets supplied by the material supplier(s).

Testing

- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, upon request of the Illinois EPA, the Permittee shall conduct testing of each VOM- or HAP-containing raw material for HAPs using USEPA Method 311.
- C. Testing shall be conducted as follows:
 - I. The Permittee shall test the top five raw materials that make the largest contributions to individual and total HAP emissions based upon a review of the individual materials' material safety data sheets (MSDSs) or other specification data sheets supplied by the material supplier(s), and material usage. The largest contributions are defined as the product of usage and HAP content.
 - II. If two raw materials differ only in pigment, then both do not have to be tested.
 - III. Testing may be conducted by the supplier of the HAP-containing material.

4. Emissions Reduction Market System (ERMS)

- a. Pursuant to 35 IAC 205.200, this source is considered a "participating source" for purposes of the ERMS. As further addressed by Condition 3.4(g), below, the allotment of Allotment Trading Units (ATUs) to this source is 135 ATUs per seasonal allotment period.
- b. **Obligation to Hold ATUs**
 - i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 3.4(g), below, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation", as described in Condition 3.4(e), below.
 - A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, pursuant to 35 IAC 205.220;
 - B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4.0 of this permit, pursuant to 35 IAC 205.225;
 - C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, pursuant to 35 IAC 205.320(e)(3);
 - D. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - E. VOM emissions from certain new and modified emission units as addressed by Condition 3.4(g)(b)(ii), if applicable, pursuant to 35 IAC 205.320(f).

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- ii. Notwithstanding the requirements of Condition 3.4(b)(i), above, pursuant to 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit

c. Market Transactions

- i. Pursuant to 35 IAC 205.610(a), the Permittee shall apply to the Illinois EPA, and obtain authorization, for a Transaction Account prior to conducting any market transactions.
- ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account.
- iii. Pursuant to 35 IAC 205.620(a), the Permittee shall have at least one account officer designated for its Transaction Account.
- iv. Pursuant to 35 IAC 205.620, any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the Permittee fails to hold ATUs in accordance with Condition 3.4(b), it shall provide emissions excursion compensation in accordance with the following requirements:

- i. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the Alternative Compliance Market Account (ACMA) in the amount specified by the notice, as follows:
 - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- ii. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 4, 5 and 6 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions: No exceptions.

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- ii. Pursuant to 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the Illinois EPA, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information:
 - A. Actual seasonal emissions of VOM from the source;
 - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- ii. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

- i. Pursuant to 35 IAC 205.150, the allotment of ATUs to this source is 135 ATUs per seasonal allotment period.
 - A. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 15.26 tons per season. This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 and 1995 season due to non-representative conditions in this season, as allowed by 35 IAC 205.320(a)(2).

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- B. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 3.4(i) of this permit.
 - C. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - D. Condition 3.4(b)(i) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- ii. The Permittee has not requested contingent allotments for new or modified emission units pursuant to 35 IAC 205.310(b)(5).
 - iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
 - B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
 - C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report;
- ii. Information on actual VOM emissions, as specified in detail in Sections 4, 5 and 6 of this permit and Condition 3.4(e)(i), above; and
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following conditions:
 - A. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to Section 112 of the Clean Air Act;
 - B. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - C. An emission unit for which a Lowest Achievable Emission Rate (LAER) demonstration has been approved by the Illinois EPA on or after November 15, 1990.

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- ii. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using Best Available Technology (BAT) for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.

5. Source-wide Non-Applicability Determinations

See Sections 4, 5 and 6 for unit-specific non-applicability determinations.

6. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from the following applicable requirements:
 - I. Condition 3.1(a)(i);
 - II. Condition 3.3(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required by this permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the Illinois EPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

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c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Plant 1 Dispersion and Colorant Manufacturing Equipment

1. Emission Units and Operations

<i>Emission Units and Associated Equipment</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
High Speed Disperser PlX1	SO ₂ , PM/PM ₁₀ , VOM and HAPs	6/1989	N/A	Dust Collector (DC-1); Thermal Oxidizer (TO-1)	Pressure Drop; Thermal Oxidizer Combustion Temperature
High Speed Disperser PlX2		8/1986			
High Speed Disperser PlX3		8/1986			
High Speed Disperser PlX4		3/1995			
High Speed Disperser PlX5		4/1996			
High Speed Disperser PlX6		8/1990			
High Speed Disperser PlX7		8/1990			
Eiger Mill PlE1		8/1986			
Eiger Mill PlE2		8/1986			
Eiger Mill PlE3		1/1989			
Eiger Mill PlE4		6/1990			
Eiger Mill PlE5		8/1990			
Eiger Mill PlE6		2/1992			
Eiger Mill PlE7		10/1992			
Eiger Mill PlE8		10/1992			
Eiger Mill PlE9		8/1994			
Eiger Mill PlE10		12/2014			
Eiger Mill PlL1 (Lab)		6/1991			
Eiger Mill PlL2 (Lab)		1/1987			
Tank Washer TW		5/1995			
Equipment Washer PW1		4/1995			
Equipment Washer PW2		6/1995			
Equipment Washer PW3		12/1995			
Portable Tanks (40-500 gal), 64 total		Various			

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Section 39.5(7)(a), (b), and (d) of the Act. In addition, the Permittee shall comply with the applicable requirements in Section 5 of this permit.

a. i. Visible Emissions (Opacity) Requirements

Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, except as allowed by 35 IAC 212.123(b) and 212.124.

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ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b), (c), and (d) of the Act, the Permittee shall demonstrate compliance with the visible emission provision of Condition 4.1.2(a)(i) through periodic visible emissions observations as follows:
- I. The Permittee shall conduct visible emissions observations of the dust collector and thermal oxidizer according to Conditions 4.1.2(a)(ii)(A)(II) and (III), below, on a weekly basis until at least 4 consecutive weeks of data indicates no visible emissions or the opacity of the emissions as determined by RM 9 is less than 20%. Thereafter, visible emissions observations may revert to a monthly basis. If no visible emissions are detected, or the opacity of the emissions as determined by RM 9 is less than 20%, after three consecutive months of observations, the observation frequency can be reduced to a quarterly basis. Monitoring shall revert to a weekly basis if any observation indicates the opacity of the emissions as determined by RM 9 to be 20% or higher. Monthly observations may resume after another 4 consecutive weeks of data indicates no visible emissions or the opacity of the emissions as determined by RM 9 is less than 20%. Quarterly observations may resume after no visible emissions are detected, or the opacity of the emissions as determined by RM 9 is less than 20%, after three consecutive months of additional observations.
 - II. The Permittee shall use USEPA RM 22 with an observation period of at least 6 minutes.
 - III. In lieu of RM 22, the Permittee may demonstrate compliance using USEPA RM 9 in order to quantify the percentage of opacity from the emission unit. Follow-up RM 9 observations must be performed within 24 hours after a RM 9 visible emissions observation indicates the opacity of the emissions to be 20% or higher.
 - IV. As per RM 9, opacity monitoring shall be conducted by a certified opacity observer.
 - V. Monitoring by a third party is not required unless requested in writing by the Illinois EPA.
 - VI. If visible emissions are observed using RM 22 or the opacity of the emissions as determined by RM 9 is 20% or higher, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, maintenance and repair, and/or adjustment of operating parameters of the emission unit. If corrective action was taken, the Permittee shall perform a follow-up verification of compliance by monitoring for visible emissions within 48 hours of the initial observation.
 - VII. A deviation shall be recorded in the monitoring record:
 - 1. If visible emissions are observed using RM 22 and corrective action cannot be made within 4 hours;
 - 2. If RM 22 is used to verify compliance with Condition 4.1.2(a)(i), a deviation shall be indicated in the monitoring record if visible emissions are observed for more than a total of 3 minutes during the 6 minute observation period.

3. If RM 9 is used to verify compliance with Condition 4.1.2(a)(i), a deviation shall be indicated in the monitoring record if the measured average opacity is 20% or higher over the monitoring period (i.e., 3 RM 9 test runs)

Recordkeeping

B. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall collect and maintain the following records of the visible emissions observations according to Condition 2.5:

- I. Copies of all field data sheets as per RM 9 and/or 22 which includes but is not limited to the following:
 1. Date and time the observations were performed;
 2. Name(s) of observing personnel and their affiliation;
 3. The total elapsed time for each observation, i.e., the observation period, pursuant to the method used;
 4. Identification of the equipment which was observed; and
 5. The findings of the observation including the presence of any visible emissions or the percentage of opacity.
- II. Operational status of each emission unit;
- III. An indication of the monitoring frequency, i.e., weekly, monthly or quarterly;
- IV. If applicable, a description of any corrective action taken including if the corrective action took place within 4 hours of the initial observation in which visible emissions were observed or the opacity of the emissions as determined by RM 9 was 20% or higher.

b. i. Particulate Matter (PM) Requirements

Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, which, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (See Condition 7.2).

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with the PM limitation in Condition 4.1.2(b)(i) shall be based on compliance with the operational and work practice requirements in Condition 4.1.2(e), the recordkeeping requirements in Condition 4.1.2(b)(ii)(D), below, and by use of the emissions calculation methodology specified below:
 - I. The Permittee shall assume that at least 1.0% by weight of the pigments used is emitted as particulate matter from pigment handling or 20 lbs of PM per ton of pigment used, whichever is higher. This emission factor is based on Section 6.4 of USEPA's AP-42, Fifth Edition, Volume I (May 1983). The Illinois EPA may revise this

permit to require the use of an alternate emission factor if testing conducted according to Condition 4.1.2(b)(ii)(B) reveals that the actual PM emission factor is higher than the value specified in this Condition 4.1.2(b)(ii)(A)(I).

- II. The Permittee may assume a dust collector control efficiency in the calculation of PM emissions provided that the Permittee maintains sufficient records demonstrating, to the satisfaction of the Illinois EPA, that the assumed control efficiency is representative of actual operation of the dust collector and is consistent with manufacturer specifications and emissions testing data from the facility.
- III. Compliance with the PM emission limitation in Condition 4.1.2(b)(i) assumes that the Permittee will capture and route all PM emissions from the equipment listed in Condition 4.1.1 to the dust collector.

Testing

- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, within 180 days of this permit becoming effective, the Permittee shall conduct testing of PM emissions from the dust collector using USEPA RM 5 as specified in 40 CFR Part 60, Appendix A. The Permittee shall also determine the dust collector control efficiency during this testing.
- C. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, upon request of the Illinois EPA, the PM emissions from an emission unit specified in Condition 4.1.1 shall be determined in accordance with USEPA RM 5 specified in 40 CFR Part 60, Appendix A, or other test methods as specified in the request.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall keep records of the items listed below according to Condition 2.5:
 - I. Monthly and annual quantity of solid material handled (e.g., pigment);
 - II. Monthly and annual hours of operation of each equipment;
 - III. Monthly and annual PM emissions, with supporting calculations, tons/month and tons/year.

c. i. Sulfur Dioxide (SO₂) Requirements

Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide (SO₂) into the atmosphere from any process emission source to exceed 2000 parts per million (ppm).

ii. Compliance Method (SO₂) Requirements

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall monitor compliance of the thermal oxidizer with the SO₂ limit in Condition 4.1.2(c)(i) as follows:
 - I. Only pipeline quality natural gas shall be used as fuel for the regenerative thermal oxidizer;
 - II. The Permittee shall monitor the sulfur content of all natural gas burned in the thermal oxidizer (gr/scf) as follows:

1. Semi-annual fuel sampling conducted by the Permittee using appropriate USEPA or ASTM test methods; or
 2. Record the maximum daily sulfur content over the reporting period as reported by the fuel supplier(s).
- III. The Permittee shall maintain the records required by Condition 4.1.2(c)(ii)(C), below.

Testing

- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, upon request of the Illinois EPA, the SO₂ emissions from the thermal oxidizer shall be determined in accordance with USEPA Reference Methods 6 or 6C as specified in 40 CFR Part 60, Appendix A.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall collect and maintain the following records according to Condition 2.5:
- I. Monthly and annual quantity of natural gas consumed in the thermal oxidizer (scf/month and scf/year);
 - II. Maximum total sulfur content of all natural gas burned in the thermal oxidizer (gr/scf) as determined according to Condition 4.1.2(c)(ii)(A)(II);
 - III. Monthly and annual SO₂ emissions (lbs/month and tons/year) and the maximum SO₂ emission rate in parts per million over each reporting period.
 - IV. For the purpose of calculating SO₂ emissions, unless the Permittee proposes and the Illinois EPA approves an alternate method for calculating SO₂ emissions consistent with Condition 3.1(e) of this permit, the Permittee shall base its calculations on the sulfur mass balance, with the assumption that all of the sulfur in the fuel is converted to SO₂ emissions upon combustion, and exhaust parameters from the last performance test conducted on the thermal oxidizer.

d. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303 and 218.304.
- B. Pursuant to Section 39.5(7)(a) of the Act, VOM emissions from Plant 1 shall not exceed 2.42 tons/month and 24.2 tons/year. These VOM limits supersede the VOM limits in Condition 2a of Construction Permit 95020097 (Issued 4/3/1995); Condition 1 of Construction Permit 91020049 (Issued 4/25/1991); Conditions 1a and 1b of Construction Permit 95040080 (Issued 5/24/1995); and Condition 1 of Construction Permit 92110060 (Issued 1/28/1993). These VOM limits continue to ensure that the revisions do not constitute a new major source or major modification pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). [T1R]

- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. **Compliance Method (VOM Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with the VOM emission limits in Conditions 4.1.2(d)(i)(A) and (B) shall be based on compliance with the work practice, production and operational requirements in Conditions 4.1.2(e), 5.1.2 and 5.2.1, the recordkeeping requirements in Condition 4.1.2(d)(ii)(E), and by use of the emissions calculation methodology in Condition 4.1.2(d)(ii)(B), below.
- B. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall calculate VOM emissions according to the following methodology:
- I. Using material balances and the applicable equations contained in Section 4.0 of STAPPA/ALAPCO/USEPA Emission Inventory Improvement Program (EIIP), Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II : Chapter 8 (February 2005 or later version), the Permittee shall quantify and record the amount of VOM emitted by the dispersion and colorant manufacturing equipment in Condition 4.1.1 when raw materials are processed by that equipment, taking into account the VOM content of the raw material as specified in the Material Safety Data Sheet (MSDS) or other manufacturer-supplied specification data sheet.
- II. The amount of VOM not routed to the thermal oxidizer (i.e., uncaptured VOM) is equal to the VOM emissions calculated according to Condition 4.1.2(d)(ii)(B)(I), above, multiplied by the factor $(1 - \text{VOM}_{\text{Rf}})$, where VOM_{Rf} is the value determined in Condition 4.1.2(d)(ii)(C)(II), below. The Permittee shall assume that any VOM not routed to the thermal oxidizer is emitted to the atmosphere.
- III. When using a material balance to estimate emissions, the Permittee may take into account the verifiable amount of VOM that remains bound in the finished materials and the amount of VOM remaining in VOM-containing raw materials that are shipped for off-site use. For purposes of this calculation, the amount of VOM emitted from production solvents shall not be less than 2.0% of the amount of solvent used.
- IV. VOM emissions from the thermal oxidizer stack shall be based on the VOM emission factor and destruction efficiency from the most recent stack test unless disapproved by the Illinois EPA pursuant to Condition 7.1, below. For this purpose, the VOM emission factor and destruction efficiency shall be the average of three test runs.

Testing

- C. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, within 180 days of this permit becoming effective, the Permittee shall conduct testing of VOM emissions and the VOM destruction efficiency of the thermal oxidizer in accordance with USEPA RM 25 or 25A specified in 40 CFR Part 60, Appendix A.
- I. Testing shall involve measurement of the VOM concentration at both the inlet and outlet of the thermal oxidizer;

- II. The Permittee shall concurrently calculate the amount of VOM emitted, pursuant to the methodology in Condition 4.1.2(d)(ii)(B)(I), above, as raw materials and solvents are processed by the dispersion and colorant manufacturing equipment in Condition 4.1.1 at the time of each test.
 - III. The Permittee shall calculate the fraction of VOM routed to the thermal oxidizer (VOM_{RF}) by dividing the VOM emissions at the inlet of the thermal oxidizer, as determined according to Condition 4.1.2(d)(ii)(C)(I), above, by the total VOM emissions as determined according to Condition 4.1.2(d)(ii)(C)(II), above.
- D. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, the Permittee shall conduct subsequent testing for VOM emissions and the VOM destruction efficiency of the thermal oxidizer as follows:
- I. If the VOM destruction efficiency from the previous test was less than 98%, or the VOM emissions were 80 percent or more of any applicable emission limit, a subsequent test must be conducted within three years of the previous test;
 - II. If the VOM destruction efficiency from the previous test was 98% or higher and the VOM emissions were less than 80 percent of any applicable emission limit, a subsequent test must be conducted within five years of the previous test.
 - III. The Illinois EPA may require the Permittee to conduct additional testing to determine the VOM emissions from the paint manufacturing operations in accordance with USEPA RM 25 or 25A specified in 40 CFR Part 60, Appendix A.

Recordkeeping

- E. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall keep records of the items listed below according to Condition 2.5:
- I. Monthly and annual usage of VOM containing materials, including product solvents and other raw materials;
 - II. Monthly and annual clean-up solvent usage;
 - III. Monthly and annual hours of operation;
 - IV. Monthly and annual amount of any cleanup solvent sent to off-site transfers;
 - V. Monthly and annual amount of any reclaimed cleanup solvent;
 - VI. Monthly and annual colorant production;
 - VII. MSDS, other manufacturer-supplied data sheets and all assumptions used by the Permittee to estimate VOM emissions;
 - VIII. Maximum hourly VOM emissions for each emission unit in Condition 4.1.1 to verify compliance with Condition 4.1.2(d)(i)(A), with supporting calculations;
 - IX. Total monthly and annual VOM emissions from Plant 1 to verify compliance with Condition 4.1.2(d)(i)(B), with supporting calculations.

e. i. **Production and Operational Limitations**

- A. Pursuant to Section 39.5(7)(a) of the Act, colorant production from Plant 1 shall not exceed 57,500 gallons/month and 575,000 gallons/yr. These production limits supersede the production and operational limitations in Condition 2a of Construction Permit 95020097 (Issued 4/3/1995); Condition 1 of Construction Permit 91020049 (Issued 4/25/1991); Conditions 1a and 1b of Construction Permit 95040080 (Issued 5/24/1995); and Condition 1 of Construction Permit 92110060 (Issued 1/28/1993). These production limits continue to ensure that the revisions do not constitute a new major source or major modification pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). [T1R]
- B. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- C. Pursuant to construction permit 95030015, the thermal oxidizer combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before the pigment grinding, dispensing, blending and tank washing processes (collectively, paint manufacturing operations) have begun, and this temperature shall be maintained during operation of the paint manufacturing operations. [T1]
- D. Pursuant to Construction Permit 95030015, the Permittee shall follow good operating practices for the dust collector and the thermal oxidizer. [T1]
- E. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall not conduct any paint manufacturing operation that generates VOM emissions unless the thermal oxidizer is operating.
- F. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall not conduct any paint manufacturing operation that generates particulate matter unless the dust collector is operating.

ii. **Compliance Method (Production and Operational Requirements)**

Monitoring

- A. Pursuant to construction permit 95030015, the thermal oxidizer shall be equipped with a temperature indicator to monitor afterburner combustion chamber temperature. [T1]
- G. Pursuant to Section 39.5(7)(b) and (d), the temperature indicator shall be equipped with a strip chart recorder or other electronic data storage device.
- C. Pursuant to Section 39.5(7)(b) and ((d), the Permittee shall perform an inspection of each equipment and associated control device specified in Condition 4.1.1 at least monthly. These inspections shall include maintenance and repair of defects within 15 days of the inspection.
- D. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, for purposes of Condition 4.1.2(e)(ii)(C), each inspection of the thermal oxidizer shall include, at a minimum, an inspection of the following components (as applicable):
 - I. Flow control valves and related components;
 - II. Hydraulics;

- III. Burner for nozzle and body cracking, dirt build up, deterioration and/or plugging of the orifices (during scheduled shutdowns of the thermal oxidizer for maintenance);
 - IV. Heat exchanger media;
 - V. Temperature and flow monitoring devices, which shall be checked daily; and
 - VI. Other major components as recommended by the manufacturer.
- E. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, for purposes of Condition 4.1.2(e)(ii)(C), each inspection of the dust collector shall include, at a minimum, an inspection of the following:
- I. Pressure drop across the filters, which shall be checked daily;
 - II. Air blower and air flow rates;
 - III. Dust storage area for dust buildup; and
 - IV. Other major components as recommended by the manufacturer.
- F. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall replace the dust collector filter cartridges at least once every 3 years.

Recordkeeping

- G. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records in addition to the records required by Condition 4.1.2(d)(ii)(E):
- I. Manufacturer's specifications for the thermal oxidizer and dust collector;
 - II. Daily readings and targeted range of pressure drop across the dust collector filters;
 - III. Inspections of the emission units and associated control devices, which shall include the following:
 - 1. Date of inspection and observed condition of the emission units and/or control devices;
 - 2. Date and description of maintenance performed, if any was required;
 - 3. Any adjustments to the unit's operating parameters.
 - IV. The temperature of the thermal oxidizer combustion chamber.
- H. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a record of the good operating practices for the dust collector and thermal oxidizer. These practices shall include, but are not limited to those operating practices recommended by the equipment manufacturer in the operating and maintenance manual (e.g., recommended air flow, bag maintenance and replacement frequency, etc.) to ensure that the equipment operates per design specifications.

3. Other Requirements

Pursuant to Section 39.5(7)(a), (b), and (d) of the Act, for the emission units in Condition 4.1.1 above, the Permittee shall comply with the emission limits, work practice standards and monitoring requirements in Section 5 of this permit.

4. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from the following applicable requirements:
 - I. Condition 4.1.2(a)(i);
 - II. Condition 4.1.2(b)(i);
 - III. Condition 4.1.2(c)(i);
 - IV. Conditions 4.1.2(d)(i)(A) and (B);
 - V. Conditions 4.1.2(e)(i)(A) through (E).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required by this permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).

b. Federal Reporting

Pursuant to Section 39.5(7)(f) of the Act, the Permittee shall comply with the notification and reporting requirements of Condition 5.2.

5. Non-Applicability Determinations

- a. Pursuant to 40 CFR 63.7985, the emission units in Condition 4.1.1 are not subject to 40 CFR Part 63, Subpart HHHHH, National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, because the source has chosen to accept synthetic minor limits of HAPs (see Condition 3.3) such that it remains an area source of HAPs.

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- b. Pursuant to 40 CFR 63.11494(c), the emission units in Condition 4.1.1 are not subject to 40 CFR Part 63, Subpart VVVVVV, National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, because the associated paint manufacturing operations are subject to 40 CFR Part 63, Subpart CCCCCC.
- c. Pursuant to 40 CFR 63.11579(f), the emission units in Condition 4.1.1 are not subject to 40 CFR Part 63, Subpart BBBB BB, National Emission Standards for Hazardous Air Pollutants for Chemical Preparations Industry Area Sources, because the associated paint manufacturing operations are subject to 40 CFR Part 63, Subpart CCCCCC.
- d. Pursuant to 35 IAC 218.920(A)(2), the emission units in Condition 4.1.1 are not subject to 35 IAC, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- e. Pursuant to 35 IAC 218.940(a)(2), the emission units in Condition 4.1.1 are not subject to 35 IAC, Subpart QQ, Miscellaneous Formulation Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- f. Pursuant to 35 IAC 218.960(a)(2), the emission units in Condition 4.1.1 are not subject to 35 IAC, Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- g. Pursuant to 35 IAC 218.980(a)(2), the emission units in Condition 4.1.1 are not subject to 35 IAC, Subpart TT, Other Emission Units, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- h. Pursuant to 40 CFR 64.2, the emission units in Condition 4.1.1 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each emission unit does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4.2 Plant 2 Dispersion and Colorant Manufacturing Equipment

1. Emission Units and Operations

<i>Emission Units and Associated Equipment</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
High Speed Disperser P2X1	PM/PM ₁₀ , VOM and HAPs	1/1995	N/A	Dust Collector (DC-2)	Pressure Drop
High Speed Disperser P2X2		1/1995			
High Speed Disperser P2X3		1/1995			
High Speed Disperser P2X4		1/1995			
High Speed Disperser P2X5		1/1995			
High Speed Disperser P2X6		1/1995			
High Speed Disperser P2X7		1/1995			
High Speed Disperser P2X8		1/1995			
High Speed Disperser P2X9		1/1995			
High Speed Disperser P2X10		10/1996			
High Speed Disperser P2X11		10/1996			
High Speed Disperser P2X12		10/1996			
High Speed Disperser P2X13		10/1996			
High Speed Disperser P2X14		10/1996			
Eiger Mill P2E1		1/1995			
Eiger Mill P2E2		1/1995			
Eiger Mill P2E3		1/1995			
Eiger Mill P2E4		6/1995			
Eiger Mill P2E5		10/1996			
Eiger Mill P2E6		10/1996			
Eiger Mill P2L1 (Lab)		1/1995			
Eiger Mill P2L2 (Lab)		10/1996			
Portable Tanks (<=500 gal), 6 total		Various			
Fixed Tanks P2T1 through P2T18 (18 tanks)		1/1995			

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Section 39.5(7)(a), (b), and (d) of the Act. In addition, the Permittee shall comply with the applicable requirements in Section 5 of this permit.

a. i. Visible Emissions (Opacity) Requirements

Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, except as allowed by 35 IAC 212.123(b) and 212.124.

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ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b), (c), and (d) of the Act, the Permittee shall demonstrate compliance with the visible emission provision of Condition 4.2.2(a)(i) through periodic visible emissions observations as follows:
- I. The Permittee shall conduct visible emissions observations of the dust collector according to Conditions 4.2.2(a)(ii)(A)(II) and (III), below, on a weekly basis until at least 4 consecutive weeks of data indicates no visible emissions or the opacity of the emissions as determined by RM 9 is less than 20%. Thereafter, visible emissions observations may revert to a monthly basis. If no visible emissions are detected, or the opacity of the emissions as determined by RM 9 is less than 20%, after three consecutive months of observations, the observation frequency can be reduced to a quarterly basis. Monitoring shall revert to a weekly basis if any observation indicates the opacity of the emissions as determined by RM 9 to be 20% or higher. Monthly observations may resume after another 4 consecutive weeks of data indicates no visible emissions or the opacity of the emissions as determined by RM 9 is less than 20%. Quarterly observations may resume after no visible emissions are detected, or the opacity of the emissions as determined by RM 9 is less than 20%, after three consecutive months of additional observations.
 - II. The Permittee shall use USEPA RM 22 with an observation period of at least 6 minutes.
 - III. In lieu of RM 22, the Permittee may demonstrate compliance using USEPA RM 9, in order to quantify the percentage of opacity from the dust collector. Follow-up RM 9 observations must be performed within 24 hours after a RM 9 visible emissions observation indicates the opacity of the emissions to be 20% or higher.
 - IV. As per RM 9, opacity monitoring shall be conducted by a certified opacity observer.
 - V. Monitoring by a third party is not required unless requested in writing by the Illinois EPA.
 - VI. If visible emissions are observed using RM 22 or the opacity of the emissions as determined by RM 9 is 20% or higher, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, maintenance and repair, and/or adjustment of operating parameters of the emission unit. If corrective action was taken, the Permittee shall perform a follow-up verification of compliance by monitoring for visible emissions within 48 hours of the initial observation.
 - VII. A deviation shall be recorded in the monitoring record:
 - 1. If visible emissions are observed using RM 22 and corrective action cannot be made within 4 hours;
 - 2. If RM 22 is used to verify compliance with Condition 4.2.2(a)(i), a deviation shall be indicated in the monitoring record if visible emissions are observed for more than a total of 3 minutes during the 6 minute observation period;

3. If RM 9 is used to verify compliance with Condition 4.2.2(a)(i), a deviation shall be indicated in the monitoring record if the measured average opacity is 20% or higher over the monitoring period (i.e., 3 RM 9 test runs).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall collect and maintain the following records of the visible emissions observations according to Condition 2.5:
 - I. Copies of all field data sheets as per RM 9 and/or 22 which includes but is not limited to the following:
 1. Date and time the observations were performed;
 2. Name(s) of observing personnel and their affiliation;
 3. The total elapsed time for each observation, i.e., the observation period, pursuant to the method used;
 4. Identification of the equipment which was observed; and
 5. The findings of the observation including the presence of any visible emissions or the percentage of opacity.
 - II. Operational status of each emission unit;
 - III. An indication of the monitoring frequency, i.e., weekly, monthly or quarterly;
 - IV. If applicable, a description of any corrective action taken including if the corrective action took place within 4 hours of the initial observation that showed an exceedance.

b. i. Particulate Matter (PM) Requirements

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, which, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (See Condition 7.2).
- B. Pursuant to Section 39.5(7)(a) of the Act, PM emissions from Plant 2 shall not exceed 102 lbs/month and 1,020 lbs/year. These PM limits supersede the PM limits in Condition 2 of Construction Permit 92110060 (Issued 1/28/1993) and Condition 2 of construction permit 9504008 (Issued 5/24/1995). [T1R]
- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with the PM limitations in Condition 4.2.2(b)(i) shall be based on compliance with the operational and work practice requirements in Condition 4.2.2(d), the

recordkeeping requirements in Conditions 4.2.2(b)(ii)(C) and (d)(ii), below, and by use of the following emissions calculation methodology:

- I. The Permittee shall assume that at least 1.0% by weight of the pigments used is emitted as particulate matter from pigment handling or 20 lbs of PM per ton of pigment used, whichever is higher. This emission factor is based on Section 6.4 of USEPA's AP-42, Fifth Edition, Volume I (May 1983). The Illinois EPA may revise this permit to require the use of an alternate emission factor if testing conducted according to Condition 4.1.2(b)(ii)(B) (Plant 1 dust collector test) reveals that the actual PM emission factor may be higher than the value specified in this Condition 4.2.2(b)(ii)(A)(I).
- II. The Permittee may assume a dust collector control efficiency when calculating PM emissions provided that the Permittee maintains sufficient records demonstrating, to the satisfaction of the Illinois EPA, that the assumed control efficiency is representative of actual operation of the dust collector and is consistent with manufacturer specifications and emissions testing data from the facility.
- III. Compliance with the PM emission limitations in Condition 4.2.2(b)(i) assumes that the Permittee will capture and route all PM emissions from the equipment listed in Condition 4.2.1 to the dust collector.

Testing

- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, upon request of the Illinois EPA, the PM emissions from an emission unit specified in Condition 4.2.1 shall be determined in accordance with USEPA RM 5 specified in 40 CFR Part 60, Appendix A, or other test methods as specified in the request.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall keep records of the items listed below according to Condition 2.5:
 - I. Monthly and annual quantity of solid material handled (e.g., pigment);
 - II. Monthly and annual hours of operation of each equipment;
 - III. Monthly and annual PM emissions, with supporting calculations, tons/month and tons/year.

c. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and 218.303, 218.304.
- B. Pursuant to Section 39.5(7)(a) of the Act, VOM emissions from Plant 2 shall not exceed 2.49 tons/month and 24.9 tons/year. These VOM limits supersede the VOM limits in Condition 1.1.6(a) of Construction Permit 00010010 (Issued 3/7/2001); Condition 3 of Construction Permit 02120005 (Issued 1/15/2003); Conditions 1a and 1b of Construction Permit 9504008 (Issued 5/24/1995); and Condition 1 of Construction Permit 92110060 (Issued 1/28/1993). These VOM limits continue to ensure that the revisions do not constitute a new major source or major modification pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). [T1R]

- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. **Compliance Method (VOM Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with the VOM emission limits in Conditions 4.2.2(c)(i)(A) and (B) shall be based on compliance with the work practice, production and operational requirements in Conditions 4.2.2(d), 5.1.2 and 5.2.1, the recordkeeping and reporting requirements in Condition 4.2.2(c)(ii)(E), and by use of the emissions calculation methodology in Condition 4.2.2(c)(ii)(B), below.
- B. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall calculate VOM emissions according to the following methodology:
- I. Using material balances and the applicable equations contained in Section 4.0 of EIIP, Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8 (February 2005 or later version), the Permittee shall quantify and record the amount of VOM emitted by the dispersion and colorant manufacturing equipment in Condition 4.2.1 when raw materials are processed by that equipment, taking into account the VOM content of the raw material as specified in the Material Safety Data Sheet (MSDS) or other manufacturer-supplied specification data sheet.
- II. When using a material balance to estimate emissions, the Permittee may take into account the verifiable amount of VOM that remains bound in the finished materials and the amount of VOM remaining in VOM-containing raw materials that are shipped for off-site use. For purposes of this calculation, the amount of VOM emitted from production solvents shall not be less than 2.0% of the amount of solvent used.
- III. The Permittee shall assume that all VOM emitted by the equipment in Condition 4.2.1 is emitted uncontrolled to the atmosphere.

Testing

- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, upon request of the Illinois EPA, the VOM emissions from any emission unit in Condition 4.2.1 shall be determined in accordance with USEPA RM 25 or 25A specified in 40 CFR Part 60, Appendix A.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall maintain records of the following items according to Condition 2.5:
- I. Monthly and annual records showing the name and usage of VOM containing materials, including product solvents and other raw materials;
- II. Monthly and annual records showing the name and usage of clean-up solvent;
- III. Monthly and annual hours of operation;

- IV. Monthly and annual amount of any cleanup solvent sent to off-site transfers;
- V. Monthly and annual amount of any reclaimed cleanup solvent;
- VI. Monthly and annual colorant production;
- VII. MSDS, other manufacturer-supplied data sheets and all assumptions used by the Permittee to estimate VOM emissions;
- VIII. Maximum hourly VOM emissions for each emission unit in Condition 4.2.1 to verify compliance with Condition 4.2.2(c)(i)(A), with supporting calculations;
- IX. Total monthly and annual VOM emissions from Plant 2 to verify compliance with Condition 4.2.2(c)(i)(B), with supporting calculations.

d. i. **Production and Operational Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, colorant production from Plant 2 shall not exceed 115,000 gallons/month and 1,150,000 gallons/year. These production limits supersede the production and operational limitations in Condition 1.1.5(e) of Construction Permit 00010010 (Issued 3/7/2001); Condition 4 of Construction Permit 02120005 (Issued 1/15/2003); Conditions 1a and 1b of Construction Permit 9504008 (Issued 5/24/1995); and Condition 1 of Construction Permit 92110060 (Issued 1/28/1993). These production limits continue to ensure that the revisions do not constitute a new major source or major modification pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). [T1R]
- B. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- C. Pursuant to Construction Permit 95030015, the Permittee shall follow good operating practices for the dust collector. [T1]
- D. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall not conduct any paint manufacturing operation that generates particulate matter unless the dust collector is operating.

ii. **Compliance Method (Production and Operational Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(b) and ((d), the Permittee shall perform an inspection of each equipment and associated control device specified in Condition 4.2.1 at least monthly. These inspections shall include maintenance and repair of defects within 15 days of the inspection.
- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, for purposes of Condition 4.2.2(e)(ii)(A), each inspection of the dust collector shall include, at a minimum, an inspection of the following:
 - I. Pressure drop across the filters, which shall be checked daily;
 - II. Air blower and air flow rates;
 - III. Dust storage area for dust buildup; and

- IV. Other major components as recommended by the manufacturer.
- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall replace the dust collector filter cartridges at least once every 3 years.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records in addition to the records required by Condition 4.2.2(c)(ii)(D):
 - I. Manufacturer's specifications for the dust collector;
 - II. Daily readings and targeted range of pressure drop across the dust collector filters;
 - III. Inspections of the emission units and associated control devices, which shall include the following:
 - 1. Date of inspection and observed condition of the emission unit or control device;
 - 2. Date and description of maintenance performed, if any was required;
 - 3. Any adjustments to the unit's operating parameters.
- E. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a record of the good operating practices for the dust collector. These practices shall include, but are not limited to those operating practices recommended by the equipment manufacturer in the operating and maintenance manual (e.g., recommended air flow, bag maintenance and replacement frequency, etc.) to ensure that the equipment operates per design specifications.

3. Other Requirements

Pursuant to Section 39.5(7)(a), (b), and (d) of the Act, for the emission units in Condition 4.2.1 above, the Permittee shall comply with the emission limits, work practice standards and monitoring requirements in Section 5.

4. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from the following applicable requirements:
 - I. Condition 4.2.2(a)(i);
 - II. Condition 4.2.2(b)(i)(A) through (C);
 - III. Condition 4.2.2(c)(i)(A) and (B);
 - IV. Conditions 4.2.2(d)(i)(A) through (C).

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- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required by this permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).

b. Federal Reporting

Pursuant to Section 39.5(7)(f) of the Act, the Permittee shall comply with the notification and reporting requirements of Condition 5.2.

5. Non-Applicability Determinations
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- a. Pursuant to 40 CFR 63.7985, the emission units in Condition 4.2.1 are not subject to 40 CFR Part 63, Subpart HHHHH, National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, because the source has chosen to accept synthetic minor limits of HAPs (see Condition 3.3) such that it remains an area source of HAPs.
- b. Pursuant to 40 CFR 63.11494(c), the emission units in Condition 4.2.1 are not subject to 40 CFR Part 63, Subpart VVVVV, National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, because the associated paint manufacturing operations are subject to 40 CFR Part 63, Subpart CCCCCC.
- c. Pursuant to 40 CFR 63.11579(f), the emission units in Condition 4.2.1 are not subject to 40 CFR Part 63, Subpart BBBB, National Emission Standards for Hazardous Air Pollutants for Chemical Preparations Industry Area Sources, because the associated paint manufacturing operations are subject to 40 CFR Part 63, Subpart CCCCCC.
- d. Pursuant to 35 IAC 218.920(A)(2), the emission units in Condition 4.2.1 are not subject to 35 IAC, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- e. Pursuant to 35 IAC 218.940(a)(2), the emission units in Condition 4.2.1 are not subject to 35 IAC, Subpart QQ, Miscellaneous Formulation Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- f. Pursuant to 35 IAC 218.960(a)(2), the emission units in Condition 4.2.1 are not subject to 35 IAC, Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.

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- g. Pursuant to 35 IAC 218.980(a)(2)], the emission units in Condition 4.2.1 are not subject to 35 IAC, Subpart TT, Other Emission Units, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- H. Pursuant to 40 CFR 64.2, the emission units in Condition 4.2.1 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each emission unit does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4.3 Plant 3 Dispersion and Colorant Manufacturing Equipment

1. Emission Units and Operations

<i>Emission Units and Associated Equipment</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Eiger Mill P3E1	PM/PM ₁₀ , VOM and HAPs	1/2000	N/A	Dust Collector (DC-3)	Pressure Drop
Eiger Mill P3E2		1/2000			
Eiger Mill P3E3		1/2000			
Eiger Mill P3E4		1/2000			
Eiger Mill P3E5		1/2000			
Eiger Mill P3E6		11/2004			
Eiger Mill P3E7		11/2004			
Eiger Mill P3E8		11/2004			
Eiger Mill P3E9		11/2004			
Eiger Mill P3E10		11/2004			
Mixer/Dispenser P3X1		1/2000			
Mixer/Dispenser P3X2		1/2000			
Mixer/Dispenser P3X3		1/2000			
Mixer/Dispenser P3X4		1/2000			
Mixer/Dispenser P3X5		1/2000			
Mixer/Dispenser P3X6		1/2000			
Mixer/Dispenser P3X7		1/2000			
Mixer/Dispenser P3X8		1/2000			
Mixer/Dispenser P3X9		1/2000			
Mixer/Dispenser P3X10		1/2000			
Mixer/Dispenser P3X11		1/2000			
Mixer/Dispenser P3X12		1/2000			
50 HP Dispenser P3X13		12/2002			
Mixer/Dispenser P3X14		11/2004			
Mixer/Dispenser P3X15		11/2004			
Mixer/Dispenser P3X16		11/2004			
Mixer/Dispenser P3X17		11/2004			
Mixer/Dispenser P3X18		11/2004			
Mixer/Dispenser P3X19		11/2004			
Mixer/Dispenser P3X20		11/2004			
Mixer/Dispenser P3X21		11/2004			
Mixer/Dispenser P3X22		11/2004			
Mixer/Dispenser P3X23		11/2004			
Mixer/Dispenser P3X24		11/2004			
Mixer/Dispenser P3X25		11/2004			
Mixer/Dispenser P3X26		12/2002			
Portable Tank (500 gal)		12/2002			
Can Filling Line P3FL1		1/2000			
Can Filling Line P3FL2		11/2004			

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<i>Emission Units and Associated Equipment</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Parts Washer P3PW1		1/2000			
Parts Washer P3PW2		1/2000			
Fixed Tanks P3T1 through P3T18 (18 tanks)		1/2000			
Fixed Tanks P3T19 through P3T36 (18 tanks)		11/2004			
De-aeration Unit P3D1		11/2004			
De-aeration Unit P3D2		11/2004			

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Section 39.5(7)(a), (b), and (d) of the Act. In addition, the Permittee shall comply with the applicable requirements in Section 5 of this permit.

a. i. Visible Emissions (Opacity) Requirements

Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, except as allowed by 35 IAC 212.123(b) and 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(b), (c), and (d) of the Act, the Permittee shall demonstrate compliance with the visible emissions provision of Condition 4.3.2(a)(i) through periodic visible emissions observations as follows:

- I. The Permittee shall conduct visible emissions observations of the dust collector according to Conditions 4.3.2(a)(ii)(A)(II) and (III), below, on a weekly basis until at least 4 consecutive weeks of data indicates no visible emissions or the opacity of the emissions as determined by RM 9 is less than 20%. Thereafter, visible emissions observations may revert to a monthly basis. If no visible emissions are detected, or the opacity of the emissions as determined by RM 9 is less than 20%, after three consecutive months of observations, the observation frequency can be reduced to a quarterly basis. Monitoring shall revert to a weekly basis if any observation measures the opacity of the emissions as determined by RM 9 to be 20% or higher. Monthly observations may resume after another 4 consecutive weeks of data indicates no visible emissions or the opacity of the emissions as determined by RM 9 is less than 20%. Quarterly observations may resume after no visible emissions are detected, or the opacity of the emissions as determined by RM 9 is less than 20%, after three consecutive months of additional observations.
- II. The Permittee shall use USEPA RM 22 with an observation period of at least 6 minutes.
- III. In lieu of RM 22, the Permittee may demonstrate compliance using USEPA RM 9 in order to quantify the percentage of opacity from the emission unit. Follow-up RM 9 observations must be performed within 24 hours after a RM 9 visible emissions observation indicates the opacity of the emissions to be 20% or higher.

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- IV. As per RM 9, opacity monitoring shall be conducted by a certified opacity observer.
- V. Monitoring by a third party is not required unless requested in writing by the Illinois EPA.
- VI. If an exceedance is indicated, pursuant to Condition 4.3.2(a)(i), the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, maintenance and repair, and/or adjustment of operating parameters of the emission unit. If corrective action was taken, the Permittee shall perform a follow-up verification of compliance by monitoring for visible emissions within 48 hours of the initial observation.
- VII. A deviation shall be recorded in the monitoring record:
 - 1. If visible emissions are observed using RM 22 and corrective action cannot be made within 4 hours;
 - 2. If RM 22 is used to verify compliance with Condition 4.3.2(a)(i), a deviation shall be indicated in the monitoring record if visible emissions are observed for more than a total of 3 minutes during the 6 minute observation period.
 - 3. If RM 9 is used to verify compliance with Condition 4.3.2(a)(i), a deviation shall be indicated in the monitoring record if the emission unit's average opacity is 20% or higher over the monitoring period (i.e., 3 RM 9 test runs)

Recordkeeping

- B. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall collect and maintain the following records of the visible emissions observations according to Condition 2.5:
 - I. Copies of all field data sheets as per RM 9 and/or 22 which includes but is not limited to the following:
 - 1. Date and time the observations were performed;
 - 2. Name(s) of observing personnel and their affiliation;
 - 3. The total elapsed time for each observation, i.e., the observation period, pursuant to the method used;
 - 4. Identification of the equipment which was observed; and
 - 5. The findings of the observation including the presence of any visible emissions or the percentage of opacity.
 - II. Operational status of each emission unit;
 - III. An indication of the monitoring frequency, i.e., weekly, monthly or quarterly;
 - IV. If applicable, a description of any corrective action taken including if the corrective action took place within 4 hours of the initial observation in which visible emissions were observed or the opacity of the emissions as determined by RM 9 was 20% or higher.

b. i. **Particulate Matter (PM) Requirements**

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, which, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See Condition 7.2).
- B. Pursuant to Section 39.5(7)(a) of the Act, PM emissions from Plant 3 shall not exceed 346 lbs/month and 3,460 lbs/year. These PM limits supersede the PM limits in Condition 1.1.6(a) of Construction Permit 00010010 (Issued 3/7/2001); Condition 2 of Construction Permit 02120005 (Issued 1/15/2003); and Condition 1.1.6(b) of Construction Permit 04110035 (Issued 1/31/2005). [T1R]
- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. **Compliance Method (PM Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with the PM limitations in Condition 4.3.2(b)(i) shall be based on compliance with the operational and work practice requirements in Condition 4.3.2(d), the recordkeeping requirements in Condition 4.3.2(b)(ii)(C), below, and by use of the following emissions calculation methodology:
 - I. The Permittee shall assume that at least 1.0% by weight of the pigments used is emitted as particulate matter from pigment handling or 20 lbs of PM per ton of pigment used, whichever is higher. This emission factor is based on Section 6.4 of USEPA's AP-42, Fifth Edition, Volume I (May 1983). The Illinois EPA may revise this permit to require the use of an alternate emission factor if testing conducted according to Condition 4.1.2(b)(ii)(B) reveals that the actual PM emission factor is higher than the value specified in this Condition 4.1.2(b)(ii)(A)(I).
 - II. The Permittee may assume a dust collector control efficiency in the calculation of PM emissions provided that the Permittee maintains sufficient records demonstrating, to the satisfaction of the Illinois EPA, that the assumed control efficiency is representative of actual operation of the dust collector and is consistent with manufacturer specifications and emissions testing data from the facility.
 - II. Compliance with the PM emission limitations in Condition 4.3.2(b)(i) assumes that the Permittee will capture and route all PM emissions from the equipment listed in Condition 4.3.1 to the dust collector.

Testing

- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, upon request of the Illinois EPA, the PM emissions from any equipment listed in Condition 4.3.1 shall be determined in accordance with RM 5 specified in 40 CFR Part 60, Appendix A, or other test methods as specified in the request.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall keep records of the items listed below according to Condition 2.5:
- I. Monthly and annual quantity of solid material handled (e.g., pigment);
 - II. Monthly and annual hours of operation of each equipment;
 - III. Monthly and annual PM emissions, with supporting calculations, tons/month and tons/year.

c. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and 218.303, 218.304.
- B. Pursuant to Section 39.5(7)(a) of the Act, VOM emissions from Plant 3 shall not exceed 0.8 tons/month and 8.0 tons/year. These VOM limits supersede the VOM limits in Condition 1.1.6(a) of Construction Permit 00010010 (Issued 3/7/2001); Condition 3 of Construction Permit 02120005 (Issued 1/15/2003); and Condition 1.1.6(a) of Construction Permit 04110035 (Issued 1/31/2005). These VOM limits continue to ensure that the revisions do not constitute a new major source or major modification pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). [T1R]
- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with the VOM emission limits in Conditions 4.3.2(c)(i)(A) and (B) shall be based on compliance with the production, operational and work practice requirements in Conditions 4.3.2(d), 5.1.2 and 5.2.1, the recordkeeping and reporting requirements in this Condition 4.3.2(c)(ii), and by use of the emissions calculation methodology in Condition 4.3.2(c)(ii)(B), below.
- B. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall calculate VOM emissions according to the following methodology:
- I. Using material balances and the applicable equations contained in Section 4.0 of STAPPA/ALAPCO/USEPA Emission Inventory Improvement Program (EIIP), Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8 (February 2005 or later version), the Permittee shall quantify and record the amount of VOM emitted by the dispersion and colorant manufacturing equipment in Condition 4.3.1 when raw materials are processed by that equipment, taking into account the VOM content of the raw material as specified in the Material Safety Data Sheet (MSDS) or other manufacturer-supplied specification data sheet.
 - II. When using a material balance to estimate emissions, the Permittee may take into account the verifiable amount of VOM that remains bound

in the finished materials and the amount of VOM remaining in VOM-containing raw materials that are shipped for off-site use. For purposes of this calculation, the amount of VOM emitted from production solvents shall not be less than 2.0% of the amount of solvent used.

- III. The Permittee shall assume that all VOM emitted by the equipment in Condition 4.3.1 is emitted uncontrolled to the atmosphere.

Testing

- C. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act and 35 IAC 218.105, upon request of the Illinois EPA, the VOM emissions from any equipment listed in Condition 4.3.1 shall be determined in accordance with USEPA RM 25 or 25A specified in 40 CFR Part 60, Appendix A.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall maintain the following records according to Condition 2.5:
- I. Monthly and annual records showing the name and usage of VOM containing materials, including product solvents and other raw materials;
 - II. Monthly and annual usage of clean-up solvent;
 - III. Monthly and annual hours of operation;
 - IV. Monthly and annual amount of any cleanup solvent sent to off-site transfers;
 - V. Monthly and annual amount of any reclaimed cleanup solvent;
 - VI. Monthly and annual colorant production;
 - VII. MSDS, other manufacturer-supplied data sheets and all assumptions used by the Permittee to estimate VOM emissions;
 - VIII. Maximum hourly VOM emissions for each emission unit in Condition 4.3.1 to verify compliance with Condition 4.3.2(c)(i)(A), with supporting calculations;
 - IX. Total monthly and annual VOM emissions from Plant 3 to verify compliance with Condition 4.3.2(c)(i)(B), with supporting calculations.

d. i. **Production and Operational Limitations**

- A. Pursuant to Construction Permit 02120005, at all times, the Permittee shall maintain and operate the 50 HP disperser in a manner consistent with good air pollution control practice for minimizing emissions. [T1]
- B. Pursuant to Section 39.5(7)(a) of the Act, colorant production from Plant 3 shall not exceed 325,000 gallons/month and 3,250,000 gallons/year. These production limits supersede the production and operational limitations in Conditions 1.1.5(e) and 1.1.11 of Construction Permit 00010010 (Issued 3/7/2001); Condition 4 of construction permit 02120005 (Issued 1/15/2003); and Conditions 1.1.5(b) and (c) of construction permit 04110035 (Issued 1/31/2005). These production limits continue to ensure that the revisions do not constitute a new major source or major modification pursuant to 35

IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). [T1R]

- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall follow good operating practices for the dust collector.
- D. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall not conduct any paint manufacturing operation that generates particulate matter unless the dust collector is operating.

ii. **Compliance Method (Production and Operational Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d), the Permittee shall perform an inspection of each equipment and associated control device specified in Condition 4.3.1 at least monthly. These inspections shall include maintenance and repair of defects within 15 days of the inspection.
- B. Pursuant to Section 39.5(7)(b), (c) and (d) of the Act, for purposes of Condition 4.3.2(d)(ii)(A), each inspection of the dust collector shall include, at a minimum, an inspection of the following:
 - I. Pressure drop across the filters, which shall be checked daily;
 - II. Air blower and air flow rates;
 - III. Dust storage area for dust buildup; and
 - IV. Other major components as recommended by the manufacturer.
- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall replace the dust collector filter cartridges at least once every 3 years.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records in addition to the records required by Condition 4.3.2(c)(ii)(E):
 - I. Manufacturer specifications for the dust collector;
 - II. Daily readings and targeted range of pressure drop across the dust collector filters;
 - III. Inspections of the emission units and associated control devices, which shall include the following:
 - 1. Date of inspection and observed condition of the emission unit or control device;
 - 2. Date and description of maintenance performed;
 - 3. Any adjustments to the unit's operating parameters.
- E. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a record of the good operating practices for the dust collector. These practices shall include, but are not limited to those operating practices recommended by the equipment manufacturer in the operating and maintenance manual (e.g., recommended air flow, bag maintenance and replacement

frequency, etc.) to ensure that the equipment operates per design specifications.

3. Other Requirements

Pursuant to Section 39.5(7)(a), (b), (d) of the Act, for the emission units in Condition 4.3.1 above, the Permittee shall comply with the emission limits, work practice standards and monitoring requirements in Section 5.

4. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from the following applicable requirements:
 - I. Condition 4.3.2(a)(i);
 - II. Conditions 4.3.2(b)(i)(A) through (D);
 - III. Condition 4.3.2(c)(i)(A) and (B);
 - IV. Conditions 4.3.2(d)(i)(B) through (E).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- ii. For the equipment specified in Condition 4.3.1, pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from the applicable requirements in Conditions 4.3.2(a) through (d), 5.1.2(a) through (e) and 5.2.1(a) through (g), unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement.
- iii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.6(b).
- iv. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- v. All deviation reports required by this permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.6(b).

b. Federal Reporting

Pursuant to Section 39.5(7)(f) of the Act, the Permittee shall comply with the notification and reporting requirements of Condition 5.2.

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5. Non-Applicability Determinations

- a. Pursuant to 40 CFR 63.7985, the emission units in Condition 4.3.1 are not subject to 40 CFR Part 63, Subpart HHHHH, National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, because the source has chosen to accept synthetic minor limits of HAPs (see Condition 3.3) such that it remains an area source of HAPs.
- b. Pursuant to 40 CFR 63.11494(c), the emission units in Condition 4.3.1 are not subject to 40 CFR Part 63, Subpart VVVVVV, National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, because the associated paint manufacturing operations are subject to 40 CFR Part 63, Subpart CCCCCC.
- c. Pursuant to 40 CFR 63.11579(f), the emission units in Condition 4.3.1 are not subject to 40 CFR Part 63, Subpart BBBB, National Emission Standards for Hazardous Air Pollutants for Chemical Preparations Industry Area Sources, because the associated paint manufacturing operations are subject to 40 CFR Part 63, Subpart CCCCCC.
- d. Pursuant to 35 IAC 218.920(A)(2), the emission units in Condition 4.3.1 are not subject to 35 IAC, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- e. Pursuant to 35 IAC 218.940(a)(2), the emission units in Condition 4.3.1 are not subject to 35 IAC, Subpart QQ, Miscellaneous Formulation Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- f. Pursuant to 35 IAC 218.960(a)(2), the emission units in Condition 4.3.1 are not subject to 35 IAC, Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- g. Pursuant to 35 IAC 218.980(a)(2), the emission units in Condition 4.3.1 are not subject to 35 IAC, Subpart TT, Other Emission Units, because the associated paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.
- h. Pursuant to 40 CFR 64.2, the emission units in Condition 4.3.1 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each emission unit does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

Section 5 - Additional Requirements

In addition to the requirements specified in Sections 3 and 4 of this permit, the Permittee must comply with the following requirements:

5.1 Additional Title 1 and State Requirements

1. Requirements of 35 IAC Part 218

a. Open-Top Mills, Tanks, Vats or Vessels

Pursuant to 35 IAC 218.624, the Permittee shall comply with the following requirements:

- i. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in) beyond the outer rim of the opening or be attached to the rim.
- ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.
- iii. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.

b. Leaks

Pursuant to 35 IAC 218.628, the Permittee shall comply with the following requirements:

- i. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
- ii. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
- iii. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.
- iv. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.

c. Grinding Mill

Pursuant to 35 IAC 218.625, the Permittee shall comply with the following requirements:

- i. No person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.
- ii. No person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.

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- iii. The manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours.

d. Cleaning Operations

- i. Pursuant to 35 IAC 218.630, the Permittee shall comply with the following requirements:
 - A. No person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.
 - B. No person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.
- ii. Pursuant to 35 IAC 218.181, the requirements of 35 IAC 218.182, 218.183, 218.184, and 218.186 shall apply to all cold cleaning, open top vapor degreasing, and conveyORIZED degreasing operations which use volatile organic materials.
- iii. Pursuant to 35 IAC 218.187(b), no owner or operator of a source subject to 35 IAC 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 IAC 218.187 unless the owner or operator meets the requirements in 35 IAC 218.187(b)(1), (b)(2), or (b)(3).
- iv. Pursuant to 35 IAC 218.187(b), except as provided by 35 IAC 218.187(a)(2), no owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 IAC 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 IAC 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).
- v. Pursuant to 35 IAC 218.187(d), in addition to complying with the work practices set forth in 35 IAC 218.187(b)(4) and (b)(5), the Permittee shall comply with the following operating requirements for each cleaning operation subject to 35 IAC 218.187:
 - A. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
 - B. Minimize air circulation around the cleaning operation;
 - C. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
 - E. Utilize equipment practices that minimize emissions;
 - E. When using cleaning solvent for wipe cleaning, cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.
- vi. Pursuant to 35 IAC 218.187(c), the Permittee shall demonstrate compliance with 35 IAC 218.187 by using the applicable test methods and procedures specified in 35 IAC 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 IAC 218.187(e).

- vii. Pursuant to 35 IAC 218.187(f)(1), if an afterburner is used to demonstrate compliance, and the Permittee is complying with 35 IAC 218.187(b)(3), the Permittee shall:
 - A. Install, calibrate, operate, and maintain temperature monitoring devices with an accuracy of 3°C or 5°F on the emissions control system in accordance with 35 IAC 218.105(d)(2) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the emissions control system is operating; and
 - B. Install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring devices, such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor.
- viii. Pursuant to 35 IAC 218.187(f)(2), if a carbon adsorber is used to demonstrate compliance, and the Permittee is complying with 35 IAC 218.187(b)(3), the Permittee shall use Agency and USEPA approved continuous monitoring equipment that is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use. The continuous monitoring equipment shall monitor the VOM concentration of each carbon adsorption bed or the exhaust of the bed next in sequence to be desorbed.
- ix. Pursuant to 35 IAC 218.187(f)(3), if an emissions control system other than an afterburner or carbon adsorber is used to demonstrate compliance with 35 IAC 218.187(b)(3), the Permittee shall install, maintain, calibrate, and operate such monitoring equipment as set forth in the owner's or operator's plan approved by the Agency and USEPA pursuant to with 35 IAC 218.187(b)(3).

e. Loading Operations

- i. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2).
- ii. Pursuant to 35 IAC 218.122(c), if no odor nuisance exists, the limitations of 35 IAC 218.122 shall only apply to the loading of volatile organic liquid (VOL) with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).

5.2 Federal Requirements

1.	40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Paints and Allied Products Manufacturing
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a. Applicability

- i. Pursuant to 40 CFR 63.11599, the affected source for purposes of 40 CFR Part 63, Subpart CCCCCC, is each paints and allied products manufacturing process identified in Conditions 4.1, 4.2, 4.3 and 6.3, and any other paints and allied products manufacturing process located at the source that processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607.
- ii. Pursuant to 40 CFR 63.11600(a), the Permittee must achieve compliance with the applicable provisions in 40 CFR Part 63, Subpart CCCCCC, by December 3, 2012.

b. Visible Emissions Limitation

- i. Pursuant to 40 CFR 63.11601(a)(5), the visible emissions from the exhaust of the particulate control device required by Condition 5.2.1(c)(i) must not exceed 10 percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.

c. Work Practice Standards

- i. At all times, pursuant to 40 CFR 63.11601(a), the Permittee must comply with the following requirements for each affected source:
 - A. The Permittee must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.
 - B. The Permittee must capture particulate emissions and route them to a particulate control device meeting the requirements of this permit during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.
 - C. The Permittee must:
 - I. Capture particulate emissions and route them to a particulate control device meeting the requirements of this permit during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - II. Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - III. Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- ii. Pursuant to 40 CFR 63.11601(b), the Permittee must comply with the following requirements for each process and storage vessel that stores or processes materials containing benzene or methylene chloride:

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- A. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the following requirements:
 - I. The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process;
 - II. The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent;
 - III. The covers or lids must be maintained in good condition.
- B. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.
- C. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:
 - I. All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and
 - II. No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.
- D. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.
- E. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

Note: The Permittee has indicated in its permit application that it does not store, process or generate any materials containing benzene or methylene chloride. Accordingly, the provisions in Condition 5.2.1(c)(ii), above, governing process and storage vessels that store or process materials containing benzene or methylene chloride are currently not applicable to the source, but are included for completeness of the applicable federal requirements. The Permittee must maintain records sufficient to demonstrate, to the satisfaction of the Illinois EPA, that materials containing benzene or methylene chloride are not stored, processed or generated at the source.

d. Compliance Requirements

- i. Initial Compliance Demonstration.
 - A. Pursuant to 40 CFR 63.11602(a)(1), the Permittee must demonstrate initial compliance by conducting, for each affected source, the inspection and monitoring activities specified below.

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- B. The Permittee must conduct an initial inspection of each particulate control device according to the following requirements and perform a visible emissions test according to Condition 5.2.1(d)(i)(C)(III). The Permittee must record the results of each inspection and test according to Condition 5.2.1(e) and perform corrective action where necessary.
 - C. The Permittee must conduct each inspection no later than 180 days after the applicable compliance date for each control device which has been operated within 60 days following the compliance date. For a control device which has not been installed or operated within 60 days following the compliance date, the Permittee must conduct an initial inspection prior to startup of the control device.
 - I. For each dry particulate control system, the Permittee must visually inspect the system ductwork and dry particulate control unit for leaks. The Permittee must also inspect the inside of each dry particulate control unit for structural integrity and condition.
 - II. An initial inspection of the internal components of a dry particulate control system is not required if there is a record that an inspection meeting the requirements of this subsection has been performed within the past 12 months and any maintenance actions have been resolved.
 - III. For each particulate control device, the Permittee must conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR Part 51, Appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in 40 CFR 63.11601(a), you must take corrective action and retest within 15 days.
- ii. Ongoing Compliance Monitoring Activities.
- A. Pursuant to 40 CFR 63.11602(a)(2), the Permittee must demonstrate ongoing compliance by conducting, for each affected source, the inspection and testing activities specified below.
 - B. Following the initial inspections required by Condition 5.2.1(d)(i), above, the Permittee must perform periodic inspections of each PM control device according to the following requirements. The Permittee must record the results of each inspection according to Condition 5.2.1(e) and perform corrective action where necessary.
 - I. The Permittee must inspect and maintain each dry particulate control unit according to the following requirements:
 - 1. Conduct weekly visual inspections of any flexible ductwork for leaks.
 - 2. Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.
 - II. For each particulate control device, the Permittee must conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR Part 60, Appendix A-7).

The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR Part 51, Appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in 40 CFR 63.11601(a)(5), you must comply with the following requirements:

1. The Permittee must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. The Permittee must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in 40 CFR 63.11601(a)(5).
2. The Permittee must prepare a deviation report in accordance with 40 CFR 63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in 40 CFR 63.11601(a)(5).
3. The Permittee must resume the visible determinations of emissions from the particulate control device in accordance with Condition 5.2.1(d)(ii)(B)(III) 3 months after the previous visible determination.

e. Recordkeeping Requirements

- i. Pursuant to 40 CFR 63.11602(b) and 63.11603(c), the Permittee must record the following information for each inspection and testing activity:
 - A. The date, place, and time;
 - B. Person conducting the activity;
 - C. Technique or method used;
 - D. Operating conditions during the activity;
 - E. Results;
 - F. Description of correction actions taken;
 - G. A copy of each notification that the Permittee submitted in accordance with 40 CFR 63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted; and
 - H. A copy of each Annual Compliance Certification Report prepared in accordance with paragraph (b) of this section.
- ii. Pursuant to 40 CFR 63.11603(c)(4), each record must be in a form suitable and readily available for expeditious review.

- iii. Pursuant to 40 CFR 63.11603(c)(5), the Permittee must keep each record for 5 years following the date of each recorded action.
- iv. Pursuant to 40 CFR 63.11603(c)(6), the Permittee must keep each record on-site for at least 2 years after the date of each recorded action. The Permittee may keep the records offsite for the remaining 3 years.

f. Notification and Reporting Requirements

- i. *Initial Notification of Applicability.* Pursuant to 40 CFR 63.11603(a)(1), if you own or operate an existing affected source, you must submit an initial notification of applicability required by §63.9(b)(2) no later than June 1, 2010. If you own or operate a new affected source, you must submit an initial notification of applicability required by 40 CFR 63.9(b)(2) no later than 180 days after initial start-up of the operations or June 1, 2010, whichever is later. The notification of applicability must include the following information:
 - A. The name and address of the owner or operator;
 - B. The address (i.e., physical location) of the affected source; and
 - C. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.
- ii. *Notification of Compliance Status.* Pursuant to 40 CFR 63.11603(a)(2), if you own or operate an existing affected source, you must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) of the General Provisions by June 3, 2013. If you own or operate a new affected source, you must submit a Notification of Compliance Status within 180 days after initial start-up, or by June 1, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with 40 CFR 63.11599(b)(3) after the applicable compliance date in 40 CFR 63.11600 (a) or (b), you must submit a Notification of Compliance Status within 180 days of the date that you commence processing, using, or generating materials containing HAP, as defined in 40 CFR 63.11607. This Notification of Compliance Status must include the following information:
 - A. Your company's name and address;
 - B. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
- iii. *Annual Compliance Certification Report.* Pursuant to 40 CFR 63.11603(b), the Permittee must prepare an annual compliance certification report according to the following requirements. This report does not need to be submitted unless a deviation from the requirements of 40 CFR Part 63, Subpart CCCCCC, has occurred. When a deviation from those requirements has occurred, the annual compliance certification report must be submitted along with the deviation report.
 - A. The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.
 - B. Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
 - C. Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review.

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If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.

- D. The annual compliance certification report must contain the following information:
- I. Company name and address;
 - II. A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and
 - III. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
- iv. *Deviation Report.* If a deviation has occurred during the reporting period, the Permittee must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with the annual compliance certification report, as required by Condition 5.2.1(f)(iii).
- v. If the Permittee no longer processes, uses, or generates materials containing HAP after December 3, 2009, the Permittee must submit a Notification in accordance with 40 CFR 63.11599(d), which must include the following information:
- A. Your company's name and address;
 - B. A statement by a responsible official indicating that the facility no longer processes, uses, or generates materials containing HAP, as defined in 63.11607, and that there are no plans to process, use or generate such materials in the future. This statement should also include the date by which the company ceased using materials containing HAP, as defined in 63.11607, and the responsible official's name, title, phone number, e-mail address and signature.

g. Applicable 40 CFR Part 63, Subpart A, Requirements (General Provisions)

Pursuant to 40 CFR 63.11599, the Permittee must comply with the following provisions of 40 CFR Part 63, Subpart A, General Provisions, that apply to Paints and Allied Products Manufacturing Area Sources:

General Provisions Citation	Subject
40 CFR 63.1	Applicability
40 CFR 63.2	Definitions
40 CFR 63.3	Units and abbreviations
40 CFR 63.4	Prohibited activities
40 CFR 63.6(a), (b)(1)-(b)(5), (c), (e)(1), (f)(2), (f)(3), (g), (i), (j)	Compliance with standards and maintenance requirements
40 CFR 63.7(a), (e), and (f)	Performance testing requirements
40 CFR 63.9(a)-(d), (i), and (j)	Notification Requirements

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<i>General Provisions Citation</i>	<i>Subject</i>
40 CFR 63.10(a), (b)(1)	Recordkeeping and Reporting
63.10(d)(1)	Recordkeeping and Reporting
40 CFR 63.12	State authority and delegations
40 CFR 63.13	Addresses of state air pollution control agencies and EPA regional offices
40 CFR 63.15	Availability of information and confidentiality

2. 40 CFR Part 60

This section is reserved for additional federal requirements that apply to the emission units specifically listed in Conditions 4.1, 4.2 and 4.3. See Section 6.0 of this permit for federal requirements that apply to insignificant emission units.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

a. Identification of Insignificant Activities Subject to Federal Requirements

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities listed below are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. Pursuant to Section 39.5(7)(a), (b), and (d) of the Act, the Permittee shall comply with the applicable requirements specified below in addition to the applicable requirements in Condition 6.4:

<i>Insignificant Activity</i>	<i>Construction Date</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Natural gas-fired emergency stationary reciprocating internal combustion engine rated at 48 brake horsepower (HP).	07/16/2012	1	35 IAC 201.210(a)(15)

b. National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ

- i. Pursuant to 40 CFR 63.6605, the 48 HP natural gas-fired emergency engine (affected engine) is subject to 40 CFR Part 63, Subpart ZZZZ.
- ii. Pursuant to 40 CFR 63.6590(c), the affected engine must comply with 40 CFR Part 63, Subpart ZZZZ, by complying with 40 CFR Part 60, Subpart JJJJ. No further requirements apply to the affected engine under 40 CFR Part 63, Subpart ZZZZ.

c. New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ

i. Emission Standards

- A. Pursuant to 40 CFR 60.4233(d) and Table 1 to 40 CFR Part 60, Subpart JJJJ, the Permittee shall comply with the following emission standards that apply to emergency engines:

- I. NO_x + HC: 10 grams per horsepower-hour (g/hp-hr);
- II. CO: 387 g/hp-hr

- B. Pursuant to 40 CFR 60.4234, the Permittee must comply with the emission standards in Condition 6.1(c)(i)(A), above, over the entire life of the engine.

ii. Compliance Method (40 CFR Part 60, Subpart JJJJ)

- A. Pursuant to 40 CFR 60.4243(b), the Permittee must demonstrate compliance with the emission standards in Condition 6.1(c)(i), above, according to one of the methods specified below:
 - I. Purchasing an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR 60.4243(a); or

- II. Purchasing a non-certified engine and demonstrating compliance with the emission standards in Condition 6.1(c)(i), above, and according to the performance testing requirements specified in 60.4244, as applicable, and the following requirements:
 - 1. Pursuant to 40 CFR 60.4243(b)(2)(i), the Permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - 2. In addition, pursuant to 40 CFR 60.4243(b)(2)(i), the Permittee must conduct an initial performance test according to the requirements in 40 CFR 60.4244 to demonstrate compliance.
- B. Pursuant to 40 CFR 60.4234, the Permittee must comply with the emission standards in Condition 6.1(c)(i), above, over the entire life of the engine.

iii. Work Practice and Operational Requirements

- A. Pursuant to 40 CFR 60.4243(d), in order for the engine to be considered an emergency stationary internal combustion engine (ICE) under 40 CFR Part 60, Subpart JJJJ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 60.4243(d)(1) through (3), is prohibited. If the Permittee does not operate the engine according to the requirements in 40 CFR 60.4243(d)(1) through (3), the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart JJJJ, and must meet all requirements for non-emergency engines.
- B. Pursuant to 40 CFR 60.4243(d), the Permittee must operate the affected engine according to the following requirements:
 - I. Pursuant to 40 CFR 60.4243(d)(1), there is no time limit on the use of the emergency engine in emergency situations.
 - II. Pursuant to 40 CFR 60.4243(d)(2), the Permittee may operate the affected engine for any combination of the purposes specified below, for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Condition 6.1(c)(iii)(B)(III), below, counts as part of the 100 hours per calendar year.
 - 1. The Permittee may operate the affected engine for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Illinois EPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency engine beyond 100 hours per calendar year..
 - 2. The Permittee may operate the affected engine for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 60.17), or other authorized entity as determined by the Reliability

Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

3. The Permittee may operate the affected engine for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

III. Pursuant to 40 CFR 60.4243(d)(3), the Permittee may operate the affected engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Condition 6.1(c)(iii)(B)(II), above. Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

IV. Pursuant to 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

1. The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
2. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region;
3. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines;
4. The power is provided only to the facility itself or to support the local transmission and distribution system;
5. The Permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the Permittee.

C. Pursuant to 40 CFR 60.4243(e), the Permittee may operate the affected natural gas-fired engine using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the Permittee must conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233.

D. Pursuant to 40 CFR 60.4243(f), if the Permittee purchases a non-certified engine or does not operate and maintain a certified stationary spark ignition internal combustion engine and control device according to the manufacturer's written emission-related instructions, the Permittee must perform initial performance testing as indicated in 40 CFR 60.4243, but the Permittee is not required to conduct subsequent performance testing unless the stationary engine is rebuilt or undergoes major repair or maintenance.

A rebuilt stationary spark ignition internal combustion engine means an engine that has been rebuilt as that term is defined in 40 CFR 94.11(a).

iv. Monitoring and Testing

- A. Pursuant to 40 CFR 60.4237(c), the Permittee must install a non-resettable hour meter on the affected engine upon startup of the engine.
- B. Pursuant to 40 CFR 60.4244, the Permittee must follow the procedures in 40 CFR 60.4244(a) through (f) when conducting any performance tests.

v. Notification, Reporting and Recordkeeping

- A. Pursuant to 40 CFR 60.4245(a), the Permittee must keep records of the following information:
 - I. All notifications submitted to comply with 40 CFR Part 60, Subpart JJJJ, and all documentation supporting any notification;
 - II. Maintenance conducted on the engine;
 - III. If the affected engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable;
 - IV. If the affected engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 60.4243(a)(2), documentation that the engine meets the emission standards.
- B. Pursuant to 40 CFR 60.4245(b), the Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
- C. Pursuant to 40 CFR 60.4245(d), if the affected engine is subject to performance testing requirements, the Permittee must submit a copy of each performance test as conducted according to 60.4244 within 60 days after the test has been completed.

vi. Applicable 40 CFR Part 60, Subpart A, Requirements (General Provisions)

Pursuant to 40 CFR 60.4246, the Permittee must comply with the following provisions of 40 CFR Part 60, Subpart A (General Provisions):

General Provisions

Citation	Subject of citation	Explanation (if necessary)
40 CFR 60.1	General applicability of the General Provisions	
40 CFR 60.2	Definitions	Additional terms defined in 40 CFR 60.4248.
40 CFR 60.3	Units and abbreviations	
40 CFR 60.4	Address	

General Provisions		
Citation	Subject of citation	Explanation (if necessary)
40 CFR 60.5	Determination of construction or modification	
40 CFR 60.6	Review of plans	
40 CFR 60.7	Notification and Recordkeeping	Except that 40 CFR 60.7 only applies as specified in 40 CFR 60.4245.
40 CFR 60.8	Performance tests	Except that 40 CFR 60.8 only applies to owners and operators who are subject to performance testing in subpart JJJJ.
40 CFR 60.9	Availability of information	
40 CFR 60.10	State Authority	
40 CFR 60.11	Compliance with standards and maintenance requirements	Requirements are specified in subpart JJJJ.
40 CFR 60.12	Circumvention	
40 CFR 60.14	Modification	
40 CFR 60.15	Reconstruction	
40 CFR 60.16	Priority list	
40 CFR 60.17	Incorporations by reference	
40 CFR 60.19	General notification and reporting requirements	

2. Insignificant Activities in 35 IAC 201.210(a) and 201.211(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Plant 1		
Lab Spray Hood H-1	1	35 IAC 201.210(a) (13)
Walk in Hood WIH	1	35 IAC 201.210(a) (13)
Fill line P1FL	1	35 IAC 201.211(a)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a) (4).	6	35 IAC 201.210(a) (4)
Plant 2		
Lab Spray Hood H-2	1	35 IAC 201.210(a) (13)
Solvent Recovery Unit ROTO3	1	35 IAC 201.211(a)
Fill line P2FL	1	35 IAC 201.211(a)

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<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	9	35 IAC 201.210(a)(4)
Plant 3		
Portable Fill line P3PFL	1	35 IAC 201.211(a)
Lab Spray Booth P3H1	1	35 IAC 201.210(a)(13)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	12	35 IAC 201.210(a)(4)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

- a. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities in Conditions 6.1 and 6.2 shall, by the compliance date, comply with any standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- c. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC Part 215, Subpart K, shall apply only to photochemically reactive material.
- d. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide (SO₂) into the atmosphere from any process emission source to exceed 2000 parts per million (ppm).
- e. Pursuant to 35 IAC .122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC .122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- f. Pursuant to 35 IAC 218.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182, except as provided in 35 IAC 218.181.

5. Compliance Method

- a. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act and 35 IAC 201.210(a)(13), the Permittee shall maintain records of all coating materials used in each coating operation (excluding powder, architectural and industrial maintenance coating) sufficient to demonstrate to the satisfaction of the Illinois EPA, that aggregate VOM usage from all coating lines at the source, including VOM from coating, dilutents, and cleaning materials never exceeds 15 lbs/day.

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- b. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the Permittee shall maintain records of the sulfur content of each shipment of fuel burned in each combustion unit. The Permittee shall use the sulfur content records, and a sulfur mass balance, to calculate SO₂ emissions from the combustion unit as required by Condition 6.5(e)(ii), below.
- c. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, 35 IAC 201.210(a)(2) and (3) and 35 IAC 201.211(a), for each emission unit whose classification as an insignificant emission unit is based on the unit's potential emissions (in the absence of air pollution control equipment), the Permittee shall maintain records sufficient to demonstrate to the satisfaction of the Illinois EPA, that the unit never emits any air pollutant listed as hazardous pursuant to section 112(b) of the Clean Air Act or any regulated air pollutant (in the absence of air pollution control equipment) at a rate that exceeds the limits in 35 IAC 201.210(a)(2) and (3) and 35 IAC 201.211(a)(1) and (2).
- d. Pursuant to Section 39.5(7)(b) and (d), upon request by the Illinois EPA, the Permittee shall conduct observations of visible emissions from any emission unit using USEPA RM 22 or RM 9, as specified in the request, for the purpose of verifying compliance with the visible emissions limit of Condition 6.4(b).
- e. Pursuant to Section 39.5(7)(b), (d) and (e) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:
 - i. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
 - ii. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3) with documentation sufficient to demonstrate, to the satisfaction of the Illinois EPA, that the emissions calculation hierarchy in Condition 3.1(e) was followed.
 - iii. Records of all inspections and maintenance activities performed on each emission unit according to the manufacturer's recommendations.
 - iv. Records of all emissions tests or evaluations.

6. Notification Requirements for Insignificant Activities

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the Illinois EPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.

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- F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the Illinois EPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(12)(a)(i)(b) and (b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The Illinois EPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the Illinois EPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the Illinois EPA, Compliance Section and the Illinois EPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, the Illinois EPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the Illinois EPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the Illinois EPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The Illinois EPA, Compliance Section shall be notified prior to these tests to enable the Illinois EPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the Illinois EPA's ability to observe testing.

- c. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the Illinois EPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:
 - i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

Pursuant to 35 IAC 212.321, new process emission units for which construction or modification commenced on or after April 14, 1972 must comply with the following requirements:

- i. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, which, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below.
- ii. Pursuant to 35 IAC 212.321(b), interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation:

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units: [35 IAC 212.321(c)]

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	77.84
Sulfur Dioxide	(SO ₂)	0.0
Particulate Matter	(PM)	14.37
Nitrogen Oxides	(NO _x)	1.0
HAP, not included in VOM or PM	(HAP)	0.1
Total		93.31

Attachment 1 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Greenhouse Gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by the Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency (Illinois EPA)
kw	Kilowatts
LAER	Lowest Achievable Emission Rate
lbs	Pound

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m	Meter
MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mo	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RM	Reference Method
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

Attachment 2 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/785-1705</p>
<p>IEPA Stack Test Specialist</p>	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
<p>IEPA Air Quality Planning Section</p>	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/785-1705</p>
<p>IEPA Air Regional Field Operations Regional Office #1</p>	<p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
<p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 3 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Accurate Dispersions
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